

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re: New York City Policing During Summer 2020  
Demonstrations.

**DECLARATION OF  
DEFENSE COUNSEL IN  
FURTHER SUPPORT OF  
DEFENDANTS' MOTION  
TO DISMISS THE  
AMENDED COMPLAINTS**

This filing relates to: *all cases*

No. 20 Civ. 8924

-----X

Dara Weiss, Elissa Jacobs, and Brachah Goykadosh, attorneys duly admitted to practice in the State of New York, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

We are Senior Counsels in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and attorneys for defendants. As such, we are familiar with the facts and circumstances of this action. We make this declaration to place the relevant documents on the record in further support of defendants' motion pursuant to Rule 12(b)(1) and Rule 12(b)(6) of the Federal Rules of Civil Procedure.

1. Annexed hereto as Exhibit I is a copy of the resolution passed by the New York City Council concerning the New York City Police Reform and Reinvention Collaborative.

2. Annexed hereto as Exhibit J is a copy of the New York City Police Reform and Reinvention Collaborative Initiative Tracker.

3. Annexed hereto as Exhibit K is a copy of an updated New York City Police Department Mass Demonstration Response Recommendations Tracker. A prior version of this document was included with defendants' moving papers as Exhibit A.

Dated: New York, New York  
May 14, 2021

**GEORGIA M. PESTANA**

ACTING CORPORATION COUNSEL OF THE CITY OF NEW YORK

*Attorney for Defendants City, de Blasio, Shea, and  
Monahahn*

100 Church Street  
New York, New York 10007  
(212) 356-3523

By:



---

Brachah Goykadosh  
*Senior Counsel*  
Special Federal Litigation Division

No. 20 Civ. 8163 (CM)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re: New York City Policing During Summer 2020  
Demonstrations

**DECLARATION OF DEFENSE COUNSEL IN  
FURTHER SUPPORT OF DEFENDANTS' MOTION  
TO DISMISS THE AMENDED COMPLAINTS**

**GEORGIA M. PESTANA**

ACTING CORPORATION COUNSEL OF THE CITY OF NEW YORK

*Attorney for Defendants*

100 Church Street  
New York, New York 10007

Of Counsel: Brachah Goykadosh, Elissa Jacobs, Dara Weiss  
Tel: (212) 356-3523

*Due and timely service is hereby admitted.*

*New York, New York ....., 2021*

*.....Esq.*

*Attorney for .....*